

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

SUNCO TIMBER (KUNSHAN) CO., LTD.

Plaintiff,

v.

LINDA SUN, individually, DAVID SUN,  
individually, SHILLOCK YUAN-SUN,  
individually, and INFINITY WOOD  
PRODUCTS, LLC,  
Defendants.

Civil Action No. 1:22-cv-10833

REVISED JOINT PROPOSED SCHEDULING ORDER

Pursuant to ECF 11, Fed. R. Civ. P. 26(f), and Local Rule 16.1(d) plaintiff Sunco Timber (Kunshan) Co., Ltd. and defendants Linda Sun, David Sun, Shillock Yuan-Sun and Infinity Wood Products, LLC hereby submit the following proposed scheduling order.

\* \* \* \*

1. ***Initial Disclosures.*** Initial disclosures required by Fed. R. Civ. P. 26(a)(1) shall be completed by June 15, 2023.
2. ***Amendments to Pleadings.*** Except for good cause shown, no motions seeking leave to add new parties or to amend the pleadings to assert new claims or defenses may be filed after January 8, 2024.
3. ***Fact Discovery.***
  - a. Written discovery (requests for production of documents, interrogatories and admissions) shall be served no later than February 23, 2024.
  - b. All depositions, other than expert deposition, shall be completed by June 28, 2024.
  - c. All fact discovery, other than expert discovery shall be completed by June 28, 2024.
4. ***Discovery Limitations.*** Time length for depositions requiring an interpreter shall be extended to twelve (12) hours. The Parties do not propose any other changes to the limitation on discovery set forth in the Federal Rules of Civil Procedure and the Local Rules.

5. ***Status Conference.*** The Court will schedule a status conference at or near the close of fact discovery for case management purposes. Any party who reasonably believes that an earlier status conference will assist in the management or resolution of the case may request one from the Court upon reasonable notice to opposing counsel.
6. ***Expert Disclosures.***
  - a. Plaintiff's and Counterclaimant's trial experts shall be designated, and the information contemplated in accordance with Fed. R. Civ. P. 26(a)(2) shall be disclosed by July 29, 2024.
  - b. Plaintiff's and Counterclaimant's trial experts shall be deposed by August 30, 2024.
  - c. Defendants' and Counterclaim Defendant's trial experts shall be designated, and the information contemplated in accordance with Fed. R. Civ. P. 26(a)(2) shall be disclosed by August 28, 2024.
  - d. Defendants' and Counterclaim Defendant's trial experts shall be deposed by September 30, 2024.
  - e. All expert discovery shall be completed by September 30, 2024.
7. ***Dispositive Motions.***
  - a. All dispositive motions, including motions filed pursuant to Fed. R. Civ. P. 12 and 56, shall be filed by October 31, 2024.
  - b. Opposition to dispositive motions may be filed within 21 days of service of the motion.
  - c. Reply memorandum, not to exceed 10 pages, must be filed within 14 days after service of the opposition papers.
  - d. Sur-Reply memoranda are not permitted without approval of the Court.
8. ***Trial by Magistrate Judge.*** The parties do not consent to trial by magistrate judge at this time.
9. ***Settlement Offer and Response.*** Plaintiff will make a settlement offer by June 1, 2023 and defendants will provide a response to plaintiff by June 22, 2023.

**DATED: MAY 19, 2023**

**RESPECTFULLY SUBMITTED,**

PLAINTIFF,  
Sunco Timber (Kunshan) Co., Ltd.,  
By her Attorneys,

DEFENDANT,  
Linda Sun  
By her Attorney,

/s/ Connie C. Dai

Connie C. Dai (BBO#683330)  
Lion's Law, P.C.  
154 Wells Ave  
Newton, Massachusetts 02459  
(617) 232-7503 Telephone  
(781) 207-8574 Fax  
[connie@lionslawgroup.com](mailto:connie@lionslawgroup.com)

/s/ Theodore J. Folkman

Theodore J. Folkman (BBO 647642)  
RUBIN & RUDMAN, LLP  
53 State Street  
Boston, Massachusetts 02109  
(617) 330-7000  
[Tfolkman@rubinrudman.com](mailto:Tfolkman@rubinrudman.com)

/s/ Timothy K. Cutler

Timothy K. Cutler (BBO# 636124)  
CUTLER & WILENSKY LLP  
20 Walnut Street, Suite 1  
Wellesley, Massachusetts 02481  
(617) 232-7500 Telephone  
(617) 232-7560 Facsimile  
[tim@cutlerlegal.com](mailto:tim@cutlerlegal.com)

DEFENDANTS,  
David Sun, Shillock Yuan-Sun and Infinity  
Wood Products, LLC,  
By Their Attorneys,

/s/ Peter E. Ball

Peter E. Ball (BBO# 546031)  
Michele E. Connolly (BBO# 680946)  
Malgorzata Mrozek (BBO# 699035)  
FITCH LAW PARTNERS LLP  
84 State Street  
Boston, Massachusetts 02109  
(617) 542-5542  
[peb@fitchlp.com](mailto:peb@fitchlp.com)  
[mec@fitchlp.com](mailto:mec@fitchlp.com)  
[mam@fitchlp.com](mailto:mam@fitchlp.com)

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 19<sup>th</sup> day of May 2023.

/s/ Timothy K. Cutler

Timothy K. Cutler